

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

ANNIE JONES RAMIREZ,)	
)	
Plaintiff,)	
)	
v.)	Case No.
)	
ONE BEACON AMERICA INSURANCE CO.)	
and OZARK MOTOR LINES, INC.,)	
)	
Defendants.)	

NOTICE OF REMOVAL

1. The above-named Plaintiff, on August 7, 2013, filed her Complaint in the Chancery Court for the Thirtieth Judicial District, Memphis, Tennessee, against the above-named defendants bearing docket number CH-13-1177-2.

2. A Complaint, a courtesy copy of which was forwarded to OneBeacon American Insurance Company on August 7, 2013, and served upon Ozark Motor Lines, Inc on August 21, 2013, is attached hereto and filed herewith. These are all of the process, pleadings and orders which have been served upon these defendants.

3. Plaintiff was at the time of the commencement of said action and still is a citizen and resident of the State of Mississippi and of no other state.

4. OneBeacon American Insurance Company was at the time of the commencement of said action and still is a corporation organized under the laws of the State of Delaware and of no other state, with its principal office in Canton, Massachusetts.

5. Ozark Motor Lines, Inc. is identified as a nominal defendant only (Complaint ¶ 1), and is therefore not to be considered for the purpose of diversity jurisdiction. Defendant One Beacon

America Insurance Company admits it is the sole and proper entity to respond to Plaintiff's insurance contract complaints.

6. The amount in controversy in said action exceeds the sum or value of Seventy-Five Thousand and 00/100 Dollars (\$ 75,000.00), exclusive of interest and costs; is wholly between the citizens of different States; is within the jurisdiction of this Court, pursuant to the provisions of 28 U.S.C. § 1332; and is removable to this Court pursuant to the provisions of 28 U.S.C. § 1441.

WHEREFORE, PREMISES CONSIDERED, this Defendant prays this Court accept this Notice and proceed with the action heretofore referred to in accordance with law.

Respectfully submitted,

FEENEY & MURRAY, P.C.

By: s/sJohn Thomas Feeney

John Thomas Feeney

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CERTIFICATE OF SERVICE

I hereby certify that a copy was filed electronically and submitted to the Electronic Filing System. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the filing receipt. Parties may access this filing through the Court's electronic filing system.

This, the 29th day of August, 2013.

s/s John Thomas Feeney
John Thomas Feeney